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DOC #:

DATE FILED: 7/10/08

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July 10, 2008

Via Fax: (212) 805-6326

The Honorable  
Colleen McMahon  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street, Room 640  
New York, NY 10007

MEMO ENDORSED

Re: AMADOU BHOYE SOW v. PS INTERNATIONAL, LTD.  
08 CV 4114 (CM)

Dear Judge McMahon:

We represent the defendant in the above captioned action.

We write today, with the consent of plaintiff's counsel, our colleagues at Watters & Svetkey LLP, to request an adjournment of the pre-trial conference presently set for July 18, 2008, and further, to obtain the Court's consent to a briefing schedule on the pending motion to compel arbitration in London and a stay of this action in this Court.

With respect to the pre-trial conference, we request that same be adjourned sine die, to be re-scheduled, if necessary, to a date following the Court's determination of the pending motion. If the Court disagrees with this request, we would respectfully request that the conference be moved to the following week, July 21-25, 2008, as both Mr. Zimmerman and I will be out of the office on July 18<sup>th</sup>, 2008.

*I will undoubtedly rule on the motion early at the pre-trial conference.*

*my local Rules set the briefing schedule*

*ruleable*

*for September*

*9/19/08*

*@ 10:00 a.m.*

*Colleen McMahon*  
7/10/08

With respect to the briefing schedule for the motion, counsel agree, and respectfully request the Court's approval, to the following schedule:

- Opposition papers to be served no later than July 31, 2008;
- Reply papers to be served no later than August 15, 2008.
- The Court to schedule a hearing on the motion, for a date of the Court's convenience, thereafter.

This slightly extended schedule, beyond what is set forth in Chambers' Individual Practices, will permit counsel the time to properly investigate and brief the matter without disrupting existing family holiday schedules. We would hope the Court would allow this slightly extended briefing schedule for both of our small firms.

There have been no previous requests to Chambers for adjournments in this matter, and the present request will not affect any other scheduled dates.

We thank the court for its attention to this matter.

Respectfully submitted,



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